

Attachment 2 to Garza Declaration

ATTACHMENT NO. 2
Voter ID litigation
MEXICAN AMERICAN LEGISLATIVE CAUCUS, MALC V. TEXAS
TIME RECORDS FOR JOSE GARZA

DATE	ACTIVITY	TIME
7-15-13	Spoke with Mark Posner regarding MALC as P on SB 14 Sec. 2 etc. litigation in Tex.	.2
8-19-13	Confer with co-counsel, review co-counsel agreement discuss with Marty.	1.1
8-23-13	Receive and review DOJ complaint on SB 14, discuss with TMF and MALC staff.	.8
8-26-13	Review training material used in Bexar County on voter i.d.	.4
9-11-13	Review draft complaint, confirm with Marty at MALC re factual assertions.	.7
9-17-13	Review final draft of complaint and co-counsel agreement and final MALC retainer agreement.	.5
9-19-13	Confer and meet with MG regarding MALC potential witnesses and designees.(.8) confer with TMF regarding status of case, intervening parties. (.3)	1.1
9-21-13	Confer with and prepare MALC disclosures with MG. review internal documents etc.	1.7
10-14-13	Review and organize file, begin review of House Journal. (3.5); track down amendments. (1)	4.5
10-18-13	Confer with Sen. Garcia regarding Senate process etc. (.6)	.6
11-13-13	Tel conf. with all P's counsel. Discuss different focus from different P's group. (1); Confer with client. (.2).	1.2
11-20-13	confer with client and co-counsel regarding litigation hold, document preservation.	.3
11-25-13	Confer with ER and Martin G regarding MALC members who Opposed or favored SB 14 and discuss coordination for interviews.	.6
11-26-13	Discuss and finalize communication with state regarding contact with MALC members, with ER.	.2

12-15-13	Call and help set up interviews with Chair, Anchia, Figueroa.	.3
1-(13-17)-14	Continue efforts to set up interviews of potential witnesses, MALC related witnesses.	.4
2-7-14	review depo notices for SOS folks and DPS folks.	.1
3-13-14	review drafts of briefs on legislative privilege issue. Discuss with staff of Rep. Martinez Fischer and Sen. Rodriguez.	3
4-23-14	Ingram deposition. (6)	No charge
7-23-14	Meet with Rep. Ana Hernandez, legal committee chair for MALC, brief on status of case, discussions with Tex. AG, and on going logistics. (2)	2
8-20-14	Trial prep. Review trial briefs, confer with Posner on same, review proposed trial witnesses.	1.5
8-23-14	Review FOF, review transcripts for DC trial and depositions from dc case in preparation of witness testimony. Confer with Posner.	2
8-25-14	review memo from Ezra regarding trial order, witnesses order, etc. confer with Marty and Trey. Confer with Rep Anchia.	.4
8-30-14	Review TMF and Anchia trial testimony in DC section 5 case. Review depo of TMF in DC litigation.	2
8-31-14	Review TMF and Anchia depositions. Confer with TMF re trial testimony. Prepare witness questions for TMF. Confer with MGolando on same.	7
9-1-14	Meet with and go over possible testimony, witness prep. with TMF. (2); Travel to CC (2.8); review trial testimony in DC (2)	6.8
9-2-14	Present TMF (.6) Confer with ERosenberg and others regarding Prep for next day. (.2); Confer with legal team. (1, no charge)	.8
9-3-14	Prepare witness questions for RAnchia, go over possible testimony witness prep with RA.(1.4) Review Anchia DC transcripts.(1) Other wise attend trial. (5, no charge)	2.4
9-4-14	Present RAnchia(.5) Otherwise attend trial (6, no charge)	.5
9-5-14	trial. Travel to San Antonio. (8)	nc
10-9-14	Review Court's order. Confer with co-counsel on response to State's advisory. (1.2)	nc

10-12-14	Review draft response in opp. to state's motion for stay. Review state's application for stay from 5 th cir. review responses prepared by other ps.	3.5
10-13-14	Legal research. Confer with co-counsel. Review filings. Review drafts, confer with Posner, review rules on fee applications.	1.3
10-14-14	Review 5 th Cir. decisions, confer with co-counsel. Legal research. Review rules.	1.2
10-15-14	Review brief on Stay from Veasey Plaintiffs. Review Correspondence – confer with co-counsel.	2
10-16-14	Review brief from U.S.; review 7 th cir. dec on refusal to Rehear en banc (Posner Dissent)	2
1-29-15	Received and reviewed State's brief to the 5 th Cir. Confer with Martin G.	1.2
2-25-15	Review draft of 5 th Cir. brief, prepare for conf. call on same.	.8
3-3-15	Receive and review final filed 5 th cir. brief.	.3
7-2-15	Receive and review supplemental authorities filed.	.1
8-21-15	Discuss with co-counsel from other parties possible strategy for discussions with the State. (.4)	nc
9-2-15	Review draft of Veasey motion to expedite mandate. (.2) Review 5 th Cir. order on pending motions. (.2)	.4
7-20-16	Review 5 th Cir. en banc ruling. Review majority opinion review dissents. Confer with co-counsel. Brief client.	3.2
7-21-16	Continue to review opinion. Participate in conference on possible remedies. Confer with client. (4, discount to 1)	1
7-22-16	Review orders, review emails and communications on strategies for proceeding with Monday electoral issues and November election.	3
7-23-16	Review emails and confer with co-counsel on negotiations w/ State on provisions for remedy for upcoming special election. (2.7); brief client. (2, nc)	2.7
7-24-16	Review Spanish language translation of declaration to be used In upcoming election. Confer with co-counsel and with DOJ.	2

7-25-16	Confer with state on status of acceptable changes and possible Schedule.	.3
9-27-16	Review cert petition. Review cases cited. Confer with MG.	1.7
9-28-16	Continue review of cert petition. Review Frank v. Walker.	1
10-12-16	Travel to Austin and back (3); meeting with client's staff regarding status of case and meaning of court orders. (2).	5
10-19-16	Meeting with Dr. Charles Cotrell regarding possible voting and historical facts regarding racial intent on voter id.	1.3
10-27-16	Review response from Tex. AG on issues concerning polling place communications and treatment of voters.	.3
1-18-17	Confer with client (MALC) and with co-counsel regarding status of case and legislative strategy for 2017 session. Review emails on cert pet. conference, respond.	.8
1-19-17	review cases listed for conference for today. Confer with co-Council. Work on file organization (CaseManagement).	.6
6-5-17	Participate in conference calls regarding strategy for hearing on remedy. (.2); review filings in case, state's advisory etc. (.6). Confer with Chad and Ezra and Myrna. (.5).	1.3
6-6-17	Confer with co-counsel on positions for hearing. (.6)	nc
6-7-17	Participate in court hearing. (.6); confer with co-counsel on same. (.2); confer with client on status and possible need for aff'd. (.3)	1.1
6-8-17	Confer with RR on his client's position on remedy. (.2); review draft on briefing on scheduling and remedy options. Review comments on same. (.3)	.5
6-9-17	Legal research on findings and remedies, (.5); confer with co-counsel on same. (.2)	.7
6-11-17	Review most recent draft of brief on schedule. (.3); review e-mail on strategy on same. (.1).	.4
8-23-17	Review court's opinion on remedy. (.7); Confer with client. (.3).	1
4-27-18	Review 5 th Cir. decision, confer with client.	2
5-1-18	Participate with co-counsel on conference call to evaluate status of appellate options.	.5
6-6-18	review 5 th cir. docket. Review judgment and final opinion. (.1);	.2

	Confer with E. Rosenberg on schedule going forward. (.1)	
6-13-18	Review file, review status of 5 th Cir. record.	.2
6-19-18	Review 5 th Cir. filings on mandate. Confer with ER and MG.	.4
6-20-18	Review 5 th Cir. filings in the District Court. Review docket.	.2
6-21-18	Review emails on impact of mandate. Review trial record on TMF and Anchia depositions and trial testimony to prepare for fees application.	1.1
7-5-18	Review motion, confer with co-counsel and other P's counsel.	.2
1-30-18	Work on fees motion exhibits. Work on declaration and review of MALC costs.	2
	Total hours for Jose Garza representing MALC no charge hours)	90.6 (excluding
	Additional discount of 8.5%	82.9
	Total due Jose Garza: 82.9 @ \$613.00 per hour:	\$50,817.70